

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

GLORIA ALEXANDER, individually and/or on
behalf of all others similarly situated,

Plaintiffs,

vs.

SAFEGUARD OPERATIONS LLC; and
SAFEGUARD STORAGE PROPERTIES, LLC
d.b.a. SAFEGUARD SELF STORAGE,

Defendants.

Case No. 1:13-cv-6061 (AMD)(RLM)

**NOTICE OF UNOPPOSED MOTION
FOR CERTIFICATION OF THE
SETTLEMENT CLASS, FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, APPROVAL OF
SERVICE AWARDS, AND APPROVAL
OF THE FLSA SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement and Approval of FLSA Settlement ("Motion for Final Approval"), and in the Declaration of Christopher Q. Davis in Support of Plaintiffs' Motion for Final Approval, and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order certifying for the purposes of settlement only the following Settlement Class under Federal Rule of Civil Procedure 23(b)(3) and Section 29 U.S.C. § 216(b):

Class Members: All Individuals who, according to Defendants' records, worked in the position of Store Manager or Assistant Store Manager with Safeguard Self Storage in a location in New York during the period October 31, 2007 through the date of the Preliminary Approval Order (August 17, 2016).

Plaintiffs further request that the Court grant final approval of the Parties' Settlement Agreement, appended as Exhibit 1 to the Declaration of Christopher Q. Davis in Support of Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, Approval of FLSA Settlement and Service Awards for the Class Representatives identified therein in the amounts proposed.

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto as Exhibit A.

Dated: December 29, 2016
New York, New York

Respectfully submitted,

By: _____/s/_____

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